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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 3:10-cv-03561 WHA

DECLARATION OF WILLIAM ADAMS IN
SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL

Dept.: Courtroom 8, 19th Floor
Judge: Hon. William Alsup

1. My name is William Addison Adams and I have been working at FTI, Inc. since December of 1997. I am currently a Senior Managing Director in FTI's Technology segment.

December of 1997. I am currently a Senior Managing Director in FTI's Technology segment.

2. In my role at FTI I have primary supervision responsibility for FTI's delivery of products and services to Google. FTI delivers e-discovery services to Google which comprise data processing, review software platform consulting and production services.

products and services to Google. FTI delivers e-discovery services to Google which comprise data processing, review software platform consulting and production services.

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3. I understand that FTI's invoices to Google for the time period November 2010 to August 2011 are being submitted in support of Google's Bill of Costs in the above captioned matter. FTI respectfully requests that these invoices remain under seal.

August 2011 are being submitted in support of Google's Bill of Costs in the above captioned matter. FTI respectfully requests that these invoices remain under seal.

matter. FTI respectfully requests that these invoices remain under seal.

4. FTT's invoices include the names of service delivery personnel. FTT is in the highly competitive e-discovery business in which competitors often hire employees from their competitors. In the public domain, FTT's invoices would provide a roadmap to some of our most highly valued personnel.

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5. FTT's invoices also include detailed task based time descriptions. These descriptions include proprietary information regarding FTT's methodologies and practices developed over the course of several years. These methodologies and practices comprise FTT's intellectual property.

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6. FTT's invoices also include line item detail with respect to FTT's unit and hourly pricing as well as confirmation of strategic pricing and corporate discount programs. Publishing this data will detail FTT's pricing strategy and cause unnecessary harm.

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this data will detail FTI's pricing strategy and cause unnecessary harm.

7. For these reasons, FTI requests that the invoices be filed under seal and subject to in camera review. FTI is willing to accommodate the Court's and Oracle's review of the invoices and will make its representative available to address any questions.

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and will make its representative available to address any questions.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on July 5th, 2012.

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By: William A. Adams

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